

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FEB 21 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEASE CHAMBERS,

Defendant.

No.

4:19CR00143 CDP/DDN

INDICTMENT

The Grand Jury charges that:

COUNT I

MANUFACTURING COUNTERFEIT OBLIGATIONS: 18 U.S.C. § 471

On or about August 24, 2018, in St. Louis County, in the Eastern District of Missouri, the
Defendant,

ALEASE CHAMBERS,

with intent to defraud, did falsely make, forge, and counterfeit obligations of the United States,
that is, falsely made, forged and counterfeited twenty-dollar Federal Reserve Notes, Serial No.
ML87001543M.

All in violation of Title 18, United States Code, Section 471.

COUNT II

UTTERING COUNTERFEIT OBLIGATIONS: 18 U.S.C. § 472

On or about August 24, 2018, in St. Louis County, in the Eastern District of Missouri, the
Defendant,

ALEASE CHAMBERS,

with intent to defraud, did utter and possess falsely made, forged and counterfeited obligations of
the United States, that is, multiple counterfeited bills of United States currency in the denomination

of ten dollars, Serial No. JH48600282A, which defendant then knew to be falsely made, forged and counterfeited.

All in violation of Title 18, United States Code, Section 472.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

Pursuant to Title 18, United States Code, Sections 492 and 982(a)(2)(B) and Title 18, United States Code, Section 2461, upon conviction of offenses in violation of Title 18, United States Code, Section 471 and 472 as set forth in Counts I and II, **Defendant Alease Chambers** shall forfeit to the United States of America:

- a. all counterfeits of any coins or obligations or other securities of the United States or of any foreign government, or any articles, devices, and other things made, possessed, or used in said offense, or any material or apparatus used or fitted or intended to be used, in the making of such counterfeits, articles, devices or things; and
- b. any property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as the result of such violation.

Subject to forfeiture is a sum of money equal to the total value of any property constituting, or derived from, proceeds the defendant obtained, directly or indirectly, as a result of the offense in Counts I and II.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney